

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	) Chapter 11
	)
AN GLOBAL, LLC, <i>et al.</i> <sup>1</sup> ,	) Case No. 23-11294 (JKS)
	)
Debtors.	) (Jointly Administered)
	)
_____	) <b>Re: Docket No. 12, 65, 103, 139 &amp; 164</b>

**JOINDER OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
TO THE DEBTORS' RESPONSE TO CREDIT SUISSE MEXICO CREDIT  
OPPORTUNITIES FUND'S RESERVATION OF RIGHTS WITH  
RESPECT TO ENTRY OF FINAL DIP ORDER**

The Official Committee of Unsecured Creditors of AN Global, LLC, *et al.* (the "Committee"), by and through undersigned counsel, hereby joins (the "Joinder") the *Response of Debtors to Credit Suisse Mexico Credit Opportunities Fund's Reservation of Rights with Respect to Entry of Final DIP Order* [D.I. 164] (the "Debtors' Reply"),<sup>2</sup> and in support of this Joinder, respectfully states as follows:

**JOINDER**

1. On August 28, 2023, the Debtors filed their *Motion For Entry Of Interim And Final Orders (I) Authorizing The Debtors To (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Senior Secured Priming Liens and Superpriority Administrative Expense Claims, (III) Granting Adequate Protection to the Prepetition IL Secured Parties, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief* [D.I. 12] (the "Motion").

---

<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <http://www.kccllc.net/AgileThought>. The Debtors' address is 222 W. Las Colinas Boulevard, Suite 1650E, Irving, TX 75039.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have their meaning as set forth in the Debtor's Reply.

2. On August 30, 2023, this Court entered an order approving the Motion on an interim basis.

3. On September 15, 2023, Credit Suisse Mexico Credit Opportunities Fund (“Credit Suisse Mexico”) filed the *Credit Suisse Mexico Credit Opportunities Fund’s Reservation of Rights with Respect to Entry of Final DIP Order* [D.I. 103] (the “Reservation of Rights”).

4. The Committee concurs with, and joins in, the legal arguments advanced in the Debtors’ Reply and supports the Debtors’ request that the Reservation of Rights be disregarded and overruled on the ground that (1) Credit Suisse Mexico has no standing or (2) alternatively, that the First Lien Cap does not apply to postpetition financing, including, without limitation, the DIP Facility, so that Section 4.1 of the Intercreditor Agreement is irrelevant to the allocation of proceeds of DIP collateral to DIP lenders.

5. The Committee reserves the right to amend or supplement this Joinder in all respects.

### **CONCLUSION**

For the reasons set forth in the Debtors’ Reply and this Joinder, the Committee respectfully requests that this Court disregard and overrule the Reservation of Rights and grant such other and further relief as this Court deems just and proper.

Dated: October 3, 2023

**PACHULSKI STANG ZIEHL & JONES LLP**

*/s/ Bradford J. Sandler*

---

Robert J. Feinstein (*pro hac vice* pending)

Bradford J. Sandler (DE Bar No. 4142)

Colin R. Robinson (DE Bar No. 5524)

Cia H. Mackle (*pro hac vice* pending)

Edward C. Corma (DE Bar No. 6718)

919 N. Market Street, 17th Floor

P.O. Box 8705

Wilmington, DE 19899-8705 (Courier 19801)

Telephone: (302) 652-4100

Facsimile: (302) 652-4400

Email: rfeinstein@pszjlaw.com

bsandler@pszjlaw.com

crobinson@pszjlaw.com

cmackle@pszjlaw.com

ecorma@pszjlaw.com

*Proposed Counsel for the Official Committee of  
Unsecured Creditors*